

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ALLIANCE FOR AUTOMOTIVE INNOVATION,

Plaintiff,

v.

MAURA HEALEY, ATTORNEY GENERAL OF  
THE COMMONWEALTH OF  
MASSACHUSETTS, in her official capacity,

Defendant.

CIVIL ACTION  
NO. 1:20-cv-12090-DPW

**DEFENDANT'S AMENDED EXHIBIT LIST**

Pursuant to the Amended Scheduling Order, ECF No. 138, the Order Regulating Non-Jury Civil Trial ¶ II(4)(c)-(d), and the Clerk's Notes for Pretrial Conference, ECF No. 180, Defendant Attorney General Maura Healey respectfully submits this amended list of exhibits that she may seek to introduce into evidence at trial. This list does not include exhibits the Attorney General plans to use solely for impeachment. The Attorney General reserves the right to supplement her exhibit list prior to trial.

The Attorney General is not seeking to introduce in evidence any exhibits to which the Plaintiff objects.

Exhibits 1-12 are joint exhibit to be introduced without objection.

Exhibits 501-527 are the Attorney General's exhibits to be introduced without objection.

<b>Exhibit</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>
1	1/15/2014	Memorandum of Understanding and R2R Agreement	AAI-AAI-0002635
2	5/21/2015	Vehicle & Vehicle Services Cybersecurity DLC Protection for Global A	AAI-GM-0000008
3	10/1/2016	NHTSA Cybersecurity Best Practices for Modern Vehicles	
4	9/18/2017	Letter from John Pokrzywa to William Hanvey and others	AAI-AAI-0007281
5	4/1/2018	Data Link Connector Policy	AAI-GM-0000030
6	7/1/2019	Global Cybersecurity: NHTSA Meeting - July 2019	AAI-GM-0001192
7	12/15/2019	CAN1 4987/4986 Bus Topology	AAI-GM-0001422
8	6/29/2020	Diagnostic Services Secure Access Rights	AAI-FCA-0011090
9	10/13/2020	FCA Global Vehicle Cybersecurity Rollout	AAI-FCA-11200
10	1/7/2021	NHTSA Request for Comments and Cybersecurity Best Practices for Modern Vehicles, Draft 2020 Update	
11	1/29/2021	Global A Serial Data Architecture, Version 7.4.3	AAI-GM-0001585
12	4/9/2021	Onstar Telematics Network Security Architecture	AAI-GM-0001687
501	12/1/2015	NHTSA Report to Congress: "Electronic Systems Performance in Passenger Motor Vehicles"	AAI-AAI-0002214
502	11/28/2016	Letter from Jeffrey Massimilla to Nathaniel Beuse Re: General Motors, LLC Comments, Docket Number NHTSA-2016-0104	
503	12/13/2016	Letter from William Hanvey and others to Jack Pokrzywa and Tim Weisenberger	AAI-AAI-0007328

Exhibit	Date	Description	Bates Number
504	9/19/2017	Global Vehicle Cyber Security: Firmware Over-the-Air (FOTA)	AAI-FCA-0010947
505	2/11/2019	Email chain from Tim Turvey to Aaron Lowe, copying Bill Hanvey and others Re: Vehicle Data Access	AAI-GM-0000209
506	2/26/2019	Massachusetts Telematics Bill and Ballot Initiative Update presentation	AAI-FCA-0011208
507	5/5/2020	Letter from John Bozzella to William Long and others	AAI-AAI-0006688
508	5/19/2020	Letter from Bill Hanvey and others to John Bozzella	AAI-ACA-0013352
509	11/1/2020	Massachusetts Information for Voters, 2020 Ballot Questions	
510	11/4/2020	Letter from William Hanvey to John Bozzella	AAI-AAI-0006621
511	11/5/2020	Email chain from Laurence Sweeney to Alfred Adams, copying Stacy Lynett and others Re: Massachusetts Right to Repair in calendar 2022	AAI-GM-0001568
512	11/9/2020	Massachusetts Question 1 (2020) Right to Repair Update presentation	
513	11/25/2020	Executive Department, Council Chambers vote returns	
514	3/1/2021	Body Control Module\$GMNA_BCM Global B Initialize Master Code List	AAI-GM-0001283
515	3/9/2021	Plaintiff Alliance for Automotive Innovation's First Supplemental Responses to Attorney General Maura Healey's First Set of Interrogatories	
516	1/27/2021	MY20 Global B CGM Policy for Production	AAI-GM-0004577
517	1/27/2021	MY21 Global B CGM Policy for Production	AAI-GM-0004584
518	1/27/2021	MY22 Global B CGM Policy for Production	AAI-GM-0004591
519		Craig Smith <i>curriculum vitae</i>	
520		Brian Romansky <i>curriculum vitae</i>	

<b>Exhibit</b>	<b>Date</b>	<b>Description</b>	<b>Bates Number</b>
521	1/29/2021	Message Authentication Deep Dive	AAI-GM-0001584
522*	9/6/2016	Letter from AAA and others to Alliance for Automobile Manufacturers and Association of Global Automakers Re: Follow-up from August 24 Meeting	AAI-AAI-0007316
523**	11/3/2016	ITS Secure Vehicle Interface presentation	AAI-ACA-0022333
524**	2/12/2019	Secure ITS Framework & SVI presentation	AAI-ACA-0026065
525***	3/26/2019	Email chain from Bill Hanvey to Bill Rhodes and Tim Turvey, copying Mark Finestone and others, Re: Telematics Data	AAI-GM-0000418
526	3/20/2019	Email chain from Aaron Lowe to Jessica Simmons and Charles Haake, copying Ray Pohlman, Re: Right to Repair DRP	AAI-ACA-0008384
527*	8/14/2018	Letter from Aaron Lowe and Ray Pohlman to Donny Seyfer	AAI-AAI-0000226

\* Exhibits are being offered for the non-hearsay purpose of showing that the letter was sent but not for the truth of the statements made in the letter.

\*\* Exhibits are being offered for the non-hearsay purpose of showing that the presentation being offered in evidence was made but not for the truth of the statements made in the presentation.

\*\*\* Exhibits are being offered for the non-hearsay purpose of showing that the communications in the email chain occurred but not for the truth of the statements made in the emails.

Respectfully submitted,

MAURA HEALEY, in her official capacity as  
Attorney General of the Commonwealth of  
Massachusetts,

By her attorneys,

June 9, 2021

/s/ Phoebe Fischer-Groban

Robert E. Toone, BBO No. 663249

Eric A. Haskell, BBO No. 665533

Julia E. Kobick, BBO No. 680194

Phoebe Fischer-Groban, BBO No. 687068

Assistant Attorneys General

Christine Fimognari, BBO No. 703410

Special Assistant Attorney General

One Ashburton Place

Boston, Mass. 02108

(617) 963-2589

phoebe.fischer-groban@mass.gov

**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on June 9, 2021.

/s/ Phoebe Fischer-Groban  
Phoebe Fischer-Groban  
Assistant Attorney General